



(217) 785-1427

September 5, 2008

5th & Hill Neighborhood Rights Campaign
44 E. Main Street, Suite 208
Champaign, IL 61820

Re: 0190100008/Champaign County
Champaign/IP Town Gas
General Correspondence

Dear Members of 5th & Hill Neighborhood Rights Campaign:

Illinois EPA received your request regarding the placement of warning signs on the fence surrounding the former Manufactured Gas Plant property in mid-April. As you may already know, I responded by telephone and e-mail to Claudia Lennhoff soon after, explaining that we were sampling the soil on-site and having our toxicologist evaluate whether the site soils posed a significant health hazard. Based on the results, I sent an e-mail response to Ms. Lennhoff and wrote a Fact Sheet dealing with the issue, which was distributed in May throughout the area by mail and placed in the Site Repository at the Douglass Branch Library. In addition, at the City of Champaign's Neighborhood Meeting on the fifth of June, our Agency's chief toxicologist, Dr. Tom Hornshaw, explained how his analysis showed that the surface-soils on-site do not represent a health hazard for any realistically possible exposures.

Because Claudia Lennhoff has asked that I send a formal letter providing an answer to your original request, I am sending this letter. I apologize that the press of work at this and other projects has delayed this formal response.

To say whether contact with site soils inside the fence would be a hazard, we needed to look at contamination of soils near the surface. We first looked at data from last year's Site Investigation Report and found five samples that were a foot or less deep. Illinois EPA's toxicologist, Dr. Tom Hornshaw, determined that even very extensive contact with the levels of contamination found in these samples would not have a significant health impact, even if it went on for many years.

In order to base our decision on a larger number of samples from the site, Illinois EPA staff went to the Champaign site themselves and took another ten samples of soil from the surface to six inches deep. The results of that sampling came back from the Agency's contract lab the first week of May. We asked Dr. Hornshaw and toxicologist Cary Ware of IDPH to do separate risk assessments based on these results to determine whether frequent exposure to the soils would be a health hazard.



Each specialist made his own assumptions of how often children might play on the property and for how many years. The IDPH assessment assumed that a child would be on the site one day a week, nine months a year, for 16 years, and take in a small amount of surface soil on each visit. His conclusion was that this would result in “no apparent increased cancer risk.”

Illinois EPA’s scientist looked at two levels of exposure. In the first, children are assumed to be on the site 40 hours a week, all year, for 25 years, clearly an extreme case since the site is fenced and the site will be cleaned up long before 25 years have passed. In the second case, children are assumed to be on the site for 20 days a month during nine months of each year (when the weather is better) for ten years of their lives. In each case children are assumed to take in some soil on each visit. The calculated cancer risk from both exposure cases is similar – an increased risk of less than one cancer in 100,000. This is a level of risk viewed as acceptable at many completed U.S. Superfund projects. Note that the analysis looks at how much **increased** risk is caused by contact with the soils inside the fence. This is because, even without **any** contact with contamination, the average American now has a risk of getting cancer that is between one in four (25%) and one in two (50%).

I provide the detailed numbers above to show the evidence behind Illinois EPA’s (and IDPH’s) judgment that there is no scientific basis for requiring special “hazard” signs on the property fenceline. The existing “NO TRESPASSING” signs are enough. Clearly, the Illinois EPA does **not** want to have children trespassing on the site, for many reasons: The most obvious is that they could be injured crawling under or climbing over the fence. However, the possibility of harm from contact with the soils inside the fence is not a reason for concern.

I hope that this helps to explain to those who were not present at the City’s June 5th meeting why the Illinois EPA has not insisted upon changes in the signs at the site.

Best regards,

Stan Black
Office of Community Relations

Cc: Land File
Greg Dunn
Kurt Neibergall